

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In re:

**MID-STATES SUPPLY COMPANY, INC.,

Debtor.**

Chapter 11

Case No. 16-____ ()

**MOTION FOR ENTRY OF ORDER PROHIBITING UTILITY PROVIDERS FROM
DISCONTINUING SERVICES AND APPROVING FORM OF ADEQUATE
ASSURANCE OF PAYMENTS FOR THE CONTINUATION OF UTILITY SERVICES**

Debtor Mid-States Supply Company, Inc. (“Debtor”), pursuant to 11 U.S.C. §§ 105(a) and 366 and Fed. R. Bank. P. 9013 and in support of this Motion for Entry of Order Prohibiting Utility Providers from Discontinuing Service and Approving the Form of Adequate Assurance of Payment for the Continuation of Utility Services (the “Motion”), states and alleges as follows:

Procedural Background

1. On February 7, 2016 (the “Petition Date”), Debtor for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of Missouri.
2. Debtor remains in possession of its assets and continues to operate as debtor-in-possession in accordance with Code §§ 1107 and 1108.
3. An Official Committee of Unsecured Creditors has not yet been appointed.
4. This is a core proceeding pursuant to 28 U.S.C. § 157(2)(A).
5. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334.
6. Venue is proper in this Court pursuant to 28 U.S.C. § 1408.

Debtor’s Background

7. Debtor supplies pipes, valves and fittings to ethanol, pipeline and power industries in the United States. It also offers hoses, tools, compounds, gauges and thermometers.

In addition, Debtor provides compressed air, steam, process control and services, along with IT solutions, such as project and customer websites, PocketPC software, customer inventory management, integrated supply, order tracking system and communication options. Debtor's products are sold to a myriad of industries, including large industrial plant operations, food production, oil and gas pipeline transportation, mechanical construction and other large industrial players.

8. Founded and headquartered in Kansas City, Missouri since 1947, Debtor, a family-owned company, operates out of 23 locations, certain of which branches operate under the "Midco" fictitious brand name, in the following states—Alabama, Colorado, Kansas, Louisiana, Mississippi, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, Texas, Utah, West Virginia and Wyoming. Debtor currently has approximately 228 employees.

9. On September 1, 2011, Debtor entered into Credit and Security Agreement, as amended from time to time (the "Credit Agreement") with Wells Fargo Bank, National Association ("Wells Fargo"), under which it borrowed \$45 million, which line grew with its growth to approximately \$60 million. Using the expanded availability from Wells Fargo, Debtor roughly doubled its sales and EBITDA from fiscal 2011 through today. By 2015, a confluence of factors, including the demand for inventory with over 32,000 SKU's, no concentration in the customer base (meaning a broad demand for stocked product) and a rapid decline in the oil and gas sector, kept Debtor's inventory and payables at unsustainably high levels. These factors led Debtor's management to implement plans to right-size the business with respect to inventory, payables, rationalizing the customer base, operating expenses and tightly managing cash flow.

10. As a result of various defaults under the Credit Agreement, on August 28, 2015, Debtor entered into its first forbearance agreement with Wells Fargo. In connection with this

forbearance agreement and Debtor's restructuring efforts, on August 25, 2015, Debtor engaged Winter Harbor LLC to provide certain services of a chief restructuring officer ("CRO") and other support services. Stuart Noyes has been acting as Debtor's CRO since August 2015 pursuant to an engagement letter dated August 25, 2015, which is discussed in further detail in Debtor's application to employ Winter Harbor LLC.

11. Since the first forbearance agreement with Wells Fargo, Debtor has entered into two other forbearance agreements with Wells Fargo, the most recent of which, dated December 28, 2015, expires by its terms on February 29, 2016 and contains numerous benchmarks (the "Benchmarks"). While Debtor and its CRO have been working tirelessly to restructure its business and meet the Benchmarks, Debtor has determined in its business judgment that filing the captioned bankruptcy case is in the best interest of its creditors.

Relief Requested

12. The operation of Debtor's business requires payment for utility services, including but not limited to electricity, water, gas, telephone, internet and trash services, to numerous utility providers (collectively, the "Utility Providers").

13. As of the Petition Date, Debtor obtains utility services from numerous Utility Providers. A detailed summary of the Utility Providers is attached as **Exhibit A**.

14. Uninterrupted utility services are essential to Debtor's operations, reorganization and the success of Debtor's efforts to protect the value of its assets.

15. By the Motion, Debtor seeks a proactive order: (1) finding that the proposed assurance of future payment is adequate as to the Utility Providers within the meaning of Code § 366; (2) prohibiting the Utility Providers from altering, refusing, or discontinuing service to Debtor on account of pre-petition amount outstanding or on account of any perceived inadequacy

of Debtor's proposed adequate assurance; and (3) determining that Debtor is not required to provide any additional adequate assurance beyond what is proposed by the Motion.

16. Code § 366 protects Debtor against the immediate termination of utility services after the Petition Date. Under Code § 366, the Utility Providers may not, during the first 30 days of a Chapter 11 case, alter, refuse, or discontinue services to, or discriminate against Debtor solely on the basis of the commencement of the case or the failure of Debtor to pay a pre-petition debt. The Utility Providers may, however, do so if, following such 30-day period, Debtor does not provide "adequate assurance" of payment for post-petition services in a form "satisfactory" to the Utility Providers, subject to the Court's ability to modify the amount of adequate assurance. Pursuant to Code § 366(c)(3)(B), in determining whether an assurance of payment is adequate, the Court may not consider (a) the absence of security before the Petition Date, (b) Debtor's history of timely payments, or (c) the availability of an administrative expense priority.

17. BAPCPA dramatically altered Code § 366. Among these amendments was the creation of a new statutory scheme governing Chapter 11 debtors. Most ominously, Code § 366(c)(2) appears to grant the Utility Providers unilateral power to hold a debtor hostage by threatening to cut off service unless the provider receives adequate assurance deemed acceptable by the provider on a subjective basis. Fortunately, the Bankruptcy Code does provide the Court with the power to intervene to prevent such abuse by utility providers.

18. The Court retains the discretion to determine the amount of adequate assurance necessary or to change the fundamental requirement that assurance of payment must simply be adequate. *Compare* Code § 366(b) ("On request of a party-in-interest and after notice and a hearing, the court may order reasonable modification of the amount of the deposit or other security necessary to provide adequate assurance.") with Code § 366 (c)(3)(A) ("On request of a

party-in-interest and after notice and a hearing, the court may order modification of the amount of an assurance payment under paragraph (2) [which is governed by an adequacy standard]”).

19. Courts construing Code § 366(b) have long recognized that in determining adequate assurance, the Court is not required to give the utility providers the equivalent of a guaranty of payment, but must only determine that the utility is not subject to an unreasonable risk of nonpayment for post-petition services. *In re Astle*, 338 B.R. 855, 861 (Bankr. D. Idaho 2006); *In re Steinebach*, 303 B.R. 634, 641 (Bankr. D. Ariz. 2004) (“Adequate assurance of payment is not... absolute assurance. The key to achieving the balance required by § 366 is not to confuse adequate assurance with adequate protection, which must be provided to a creditor under 11 U.S.C. § 361.”). Historically, whether a utility is subject to an unreasonable risk of nonpayment must be determined from the facts and circumstances of each case. *See In re Anchor Glass Container Corp.*, 342 B.R. 872, 875 (Bankr. M.D. Fla. 2005). While Code § 366(c) limits the factors a court may consider, it is likely that determinations of adequate assurance will remain within the Court’s discretion. *In re Adelphia Bus. Solutions, Inc.*, 280 B.R. at 63, 80 (Bankr. S.D.N.Y. 2002); *Marion Steel Co. v. Edison Co. (In re Marion Steel Co.)*, 35 B.R. 188, 195 (Bankr. D. Ohio 1983).

20. As stated by a Virginia bankruptcy court, “§ 366(c)(3)(A) provides that on request of a party in interest and after notice and a hearing, the court may order modification of the amount of an assurance of payment under paragraph 2. Assurance of payment is defined in § 366(c)(1), and upon a request for a hearing under § 366(c)(3)(A), the court must determine whether the assurance of payment is adequate, operating within the restrictions outlined in § 366(c)(3)(B). In sum, the court is authorized to modify the assurance of payment pursuant to § 366(c)(3)(A) after notice and a hearing, and a debtor is not required to first pay a demand that is

unilaterally satisfactory to the utility company.” *In re Circuit City Stores, Inc.*, Slip Copy, 2009 WL 484553, 5 (Bankr. E.D. Va. 2009).

21. Moreover, a Florida bankruptcy court has held, “[a]n interpretation of § 366 that precludes court intervention unless a debtor posts whatever amount is demanded could lead to absurd results and cannot be what Congress intended. Instead, the Court finds that it has the authority to determine the form and amount of adequate assurance if the parties cannot reach agreement, as long as the form of the assurance of payment is one of the forms described in 366(c)(1)(A). See 3 Collier on Bankruptcy ¶ 366.03[2] (rev. 15th ed. 2006) (“Under § 366(c)(2), the debtor must pay what the utility demands, unless the court orders otherwise”) (emphasis added).” *In re Beach House Property, LLC*, Slip Copy, 2008 WL 961498, 2 (Bankr. S.D. Fla. 2008).

22. Clearly, the Court is empowered to deem adequate Debtor’s plan to provide assurance of future payment and to prohibit the discontinuance of utility services.

23. In order to provide its Utility Providers with adequate assurance of future payment, Debtor proposes to pay each Utility Provider’s invoices as they come due in the ordinary course of Debtor’s business, pursuant to the budgets approved in the post-petition financing and cash collateral motion filed herein.

24. Further, Debtor will permit each Utility Provider holding a security deposit to retain such deposit as additional adequate assurance of Debtor’s future performance. Such deposits shall be returned to Debtor on the terms and conditions of the parties’ service agreements.

25. In addition, Debtor will provide adequate notice of this Motion and objection deadline to the Utility Providers.

26. Debtor submits that the proposed form of adequate assurance of future performance does not subject the Utility Providers to undue risk and should be approved. Absent an entry of an Order by this Court approving the form of the required adequate assurance of payment, the Utility Providers may alter, refuse or discontinue further utility services to Debtor under Code § 366(c)(2). Such actions would have an immediate and detrimental effect on Debtor, its estate and Debtor's ability to reorganize effectively.

WHEREFORE, Debtor requests that this Court enter an Order: (1) finding that the proposed assurance of future payment is adequate as to the Utility Providers within the meaning of Code § 366; (2) prohibiting the Utility Providers from altering, refusing, or discontinuing service to Debtor on account of pre-petition amount outstanding or on account of any perceived inadequacy of Debtor's proposed adequate assurance; (3) determining that Debtor is not required to provide any additional adequate assurance beyond what is proposed by the Motion; and (4) granting any other relief at equity or law that this Courts deems necessary.

February 7, 2016

SPENCER FANE LLP

By: /s/ Lisa A. Epps

Scott J. Goldstein MO Bar No. 28698

Lisa A. Epps MO Bar No. 48544

Eric L. Johnson MO Bar No. 53131

1000 Walnut Street, Suite 1400

Kansas City, MO 64106

Office: 816-474-8100

Facsimile: 816-474-3216

sgoldstein@spencerfane.com

lepps@spencerfane.com

ejohnson@spencerfane.com

PROPOSED COUNSEL FOR DEBTOR

EXHIBIT A

Location	Service Type	Utility Provider Name	Address1	Address2	City	State	Zip	Phone No.	Fax No.	Account No.
Wichita	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM IL	IL	60197-6463	866-241-6567	302-655-5049	433006900
Wichita	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM IL	IL	60197-6463	866-241-6567	302-655-5049	826850893
KC/S/STEAM	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM IL	IL	60197-6463	866-241-6567	302-655-5049	834748920
Guyton	CELL PHONE SERVICES	PTCI	P.O. Box 1188		Guyton OK	OK	73942 800-562-2556		21265	
COMPANY WIDE	CELL PHONE SERVICES	VERIZON WIRELESS	P.O. BOX 25505		LEIGH VALLEY PA	PA	18002-5505	913-344-2600	212-571-1887	980588536-00001,3,5,4
COMPANY WIDE	COMPUTER/PROPHET 21	EPICORE SOFTWARE CORP	P.O. BOX 671069		DALLAS TX	TX	75267-1069	888-354-5812	512-356-0500	CUJST # 108018
Kansas City	CYBER SERVICES	AT&T	P.O. BOX 5019		CAROL STREAM IL	IL	60197-5019	800-235-7524	302-655-5049	831-000-5256 218
ALABAMA	ELECTRIC SERVICES	ALABAMA POWER	P.O. BOX 242		BIRMINGHAM AL	AL	352992 88-430-5787		26593-12019	
STL	ELECTRIC SERVICES	AMEREN MISSOURI	P.O. BOX 88068		CHICAGO IL	IL	60680-1068	866-222-3471		
Greely	ELECTRIC SERVICES	ATMOS Energy	P.O. Box 790311		St. Louis MO	MO	63179-0311		Acct#60-004607242-0011712-0	
Artesia	ELECTRIC SERVICES	Central Valley Electric	P.O. Box 230		Artesia NM	NM	88211 575-746-7571	575-746-4219	due 6-22	
Cheyenne	ELECTRIC SERVICES	Cheyenne Light Fuel & Power	P.O. BOX 6100		Rapid City SD	SD	57709-6100	800-540-2486	4807-9629-03	
HOUSTON	ELECTRIC SERVICES	GREEN MOUNTAIN ENERGY	P.O. BOX 650001		DALLAS TX	TX	75265-0001		11852011	
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	0387-70-5829
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	1283-12-7162
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	1387-72-6180
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	3033-90-1795
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	4147-09-3039
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. BOX 219330		KANSAS CITY MO	MO	64121-9330	800-585-4248	816-556-2992	4877-21-9202
DES MOINES	ELECTRIC SERVICES	MIDAMERICAN ENERGY	P.O. BOX 657		DES MOINES IA	IA	50306	563-336-3568	7596-18-7444	
OSALLOSA	ELECTRIC SERVICES	MIDAMERICAN ENERGY	P.O. BOX 657		DES MOINES IA	IA	50306	563-336-3568		
CLARKSBURG	ELECTRIC SERVICES	MON POWER	P.O. BOX 3615		AKRON OH	OH	44309-3615	800-686-0022	110 109 9172 841	
CLARKSBURG	ELECTRIC SERVICES	MON POWER	P.O. BOX 3615		AKRON OH	OH	44309-3615	800-686-0022		
Billings	ELECTRIC SERVICES	Northwestern Energy	11 E. Park St.		Butte MT	MT	59701-1711	800-245-6977	406-497-2629	acct 1584650-4 due 6-18
Omaha	ELECTRIC SERVICES	OMAHA PUBLIC POWER DISTRICT	P.O. BOX 3995		OMAHA NE	NE	68103-0995		402-636-3914	
Tulsa	ELECTRIC SERVICES	Public Service Company of Oklahoma	P.O. Box 24421		Canton OH	OH	44701 1-888-776-1368		954-173-578-1-1	
Tulsa	ELECTRIC SERVICES	Public Service Company of Oklahoma	P.O. Box 24421		Canton OH	OH	44701 1-888-776-1368		959-997-312-0-1	
Salt Lake	ELECTRIC SERVICES	Rocky Mountain Power	P.O. Box 26000		Portland OR	OR	97256-0001	800-883-4162	Acct#1166777-001 3 due 6-30	
Dickinson	ELECTRIC SERVICES	Roughrider Electric Coop	800 Highway Drive		Hazen ND	ND	58545-4701	701-748-6500	Acct 119560000 due 6-19	
Shreveport	ELECTRIC SERVICES	Southwestern Electric Power Co	P.O. Box 24401		Canton OH	OH	44701 1-888-216-3523		961-790-570-1-1	
Mt Pleasant	ELECTRIC SERVICES	Southwestern Electric Power Co	P.O. Box 24401		Canton OH	OH	44701 1-888-216-3523		963-730-570-1-5	
CLARKSBURG	ELECTRIC SERVICES	Southwestern Electric Power Co	P.O. Box 24422		Canton OH	OH	44701 1-888-216-3523		968-796-087-1-7	
Guyton	ELECTRIC SERVICES	SUN VALLEY PSD	70525 Old Rte 50		Clarksburg WV	WV	26301	304-623-3505	249(414)	
HOUSTON	ELECTRIC SERVICES	TCEC	P.O. Box 880		Hooker OK	OK	73945 1-800-522-3315	580-652-3151	44443001	
MIDLAND	ELECTRIC SERVICES	TXU ENERGY	P.O. BOX 650638		DALLAS TX	TX	75265-0638	888-399-5501	972-556-6111	1000 265-40969
STL	ELECTRIC SERVICES	VECTREN ENERGY	P.O. BOX 650638		DALLAS TX	TX	75265-0638		972-556-6111	1000(265-40969)
Eldorado	ELECTRIC SERVICES	Westar Energy	P.O. Box 738500		Topeka KS	KS	66675 1-800-401-5666	812-491-4238	620510673-57803955	
Wichita	ELECTRIC SERVICES	Westar Energy	P.O. Box 738500		Topeka KS	KS	66675 1-800-401-5666	212-616-7612	2821171904	
GREELY	ELECTRIC SERVICES	XCEL ENERGY	P.O. Box 738500		MINNEAPOLIS MN	MN	55484-9477	800-401-5666	7246595083	
GREELY	ELECTRIC SERVICES	XCEL ENERGY	P.O. Box 738500		MINNEAPOLIS MN	MN	55484-9477	800-401-5666	53-3782-295-4	
GREELY	ELECTRIC SERVICES	XCEL ENERGY	P.O. Box 738500		MINNEAPOLIS MN	MN	55484-9477	800-401-5666	53-3782-295-4	
Greely	GAS SERVICES	ALLGAS INC	P.O. BOX 9477		RAINBOW CITY AL	AL	35906 256-442-8323	256-586-7339		
Wichita	GAS SERVICES	City Of Greely	201 CORPORATE DR		Greely CO	CO	80662-1928	970-350-9628	Acct 014-786090-01	
Eldorado	GAS SERVICES	Kansas Gas Service	P.O. Box 219046	P.O. Box 1928	Kansas City MO	MO	64121 1-800-794-4780	785-575-8547	510433742 1397724 36	
Tulsa	GAS SERVICES	Kansas Gas Service	P.O. Box 219046		Kansas City MO	MO	64121 1-800-794-4780	785-575-8547	510765314 1602740 09	
Kansas City	GAS SERVICES	Oklahoma Natural Gas Co	P.O. Box 219296		Kansas City MO	MO	64121 1-405-551-6824		213005723 1058873 27	
Kansas City	GAS SERVICES	Questar Gas Company	P.O. Box 45841		Salt Lake City UT	UT	84139-0001	801-324-3757	Account 6092188115 DUE 6-29	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. BOX 219255		KANSAS CITY MO	MO	64194-3420	800-582-1234	3829122222	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. BOX 219255		KANSAS CITY MO	MO	64194-3420	800-582-1234	5289731111	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. BOX 219255		KANSAS CITY MO	MO	64194-3420	800-582-1234	615594-1111	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. BOX 219255		KANSAS CITY MO	MO	64194-3420	800-582-1234	7137871111	

Location	Service Type	Utility Provider Name	Address1	Address2	City	State	Zip	Phone No.	Fax No.	Account No.
HOUSTON	INTERNET SERVICES	BIRCH COMMUNICATIONS	P.O. BOX 105066		ATLANTA	GA	30348-5066	888-772-4724	678-388-1961	726394
MIDLAND	INTERNET SERVICES	SUDDENLINK	P.O. BOX 660365		DALLAS	TX	75266-0365	800-490-9604		3014-723248201
Kansas City	INTERNET SERVICES	TIME WARNER CABLE	P.O. BOX 1104		CAROL STREAM	IL	60132-1104	816-743-2477		108794701
Shreveport/Dickinson/Saltlake	INTERNET SERVICES	Century Link	P.O. Box 52187		Phoenix	AZ	85072-800-860-1020		318-388-9562	82499839
Artesia	INTERNET SERVICES	Century Link	P.O. Box 29040		Phoenix	AZ	85038-9040	800-600-1117	318-388-9562	575-778-8821 529
Cheyenne	INTERNET SERVICES	Century Link	P.O. Box 29040		Phoenix	AZ	85038-9040		318-388-9562	Acct 307-638-1300-0978
GREELEY	INTERNET SERVICES	Century Link	P.O. Box 29040		Phoenix	AZ	85038-9040		318-388-9562	Acct 970-392-0156 9438 / DUE 6-
OSKALOOSA	INTERNET SERVICES	CENTURY LINK	P.O. Box 29040		Phoenix	AZ	85038-9040			27
Wichita	INTERNET SERVICES	Cox Communications	P.O. Box 248871		Oklahoma	OK	73124 800-620-6196			001 1001 056416101
Eldorado	INTERNET SERVICES	Cox Communications	P.O. Box 248871		Oklahoma	OK	73124 800-620-6196			001 1002 056431601
McPherson	INTERNET SERVICES	Cox Communications	P.O. Box 248871		Oklahoma City	OK	73124 800-620-6196			001 1008 064586001
Tulsa	INTERNET SERVICES	Cox Communications	P.O. Box 248871		Oklahoma	OK	73124 800-620-6196			001 6311 069488901
MIDLAND	INTERNET SERVICES	NET WEST ONLINE	5000 EAST UNIVERSITY #11		ODESSA	TX	79762			901362195
Cheyenne	INTERNET SERVICES	Rise Broadband	P.O. Box 2837		Omaha	NE	68103-2837			07-01-15 thru 07-31-15 due 07-
Guyton	LONG DISTANCE SERVICE	AT&T	P.O. Box 105068		Atlanta	GA	30348 877-325-0445			01
Coffeyville	LONG DISTANCE SERVICE	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 030-589-2448-001
Guyton	LONG DISTANCE SERVICE	AT&T	P.O. BOX 22111		Tulsa	OK	74121 888-795-2717			302-655-5049 620-251-8880 404 3
Midland Tx/ Tulsa	LONG DISTANCE SERVICE	Century Link	P.O. Box 52187		Phoenix	AZ	85072 800-860-1020			302-655-5049 1570074295
Glenco	LONG DISTANCE SERVICE	Century Link	P.O. Box 52187		Phoenix	AZ	85072 800-860-1020			318-388-9562 83882350
Shreveport	LONG DISTANCE SERVICE	Century Link	P.O. Box 4300		Carol Stream	IL	60197 877-285-2491			318-388-9562 83930880
BILLINGS	LONG DISTANCE SERVICE	AT&T	P.O. BOX 105068		ATLANTA	GA	30348-5068 877-325-0445			417043673
STL	PHONE SERVICES	AT&T	P.O. BOX 5093		CAROL STREAM	IL	60197 800-924-1743			302-655-5049 030-589-7768 001
Kansas City	PHONE SERVICES	AT&T	P.O. BOX 10414		ATLANTA	GA	30348-5414 800-559-7928			302-655-5049 314-385-7902 909 6
Flowood	PHONE SERVICES	AT&T	102 Main St		McComb	MS	39648 866-620-6000			302-655-5049 432-563-2188 165 6
McPherson	PHONE SERVICES	AT&T	P.O. BOX 5001		ATLANTA	GA	60197-5001 877-438-0041			302-655-5049 601-992-7311 001 0592
GLENCOE	PHONE SERVICES	AT&T	P.O. BOX 105262		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 620-245-0168-920-7
Kansas City	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 816-842-3690
KC/MT PLEASANT	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 770-425-0453 651 1884
MtPleasant	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 831-000-2130 238
MtPleasant	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 903-572-3236 354
MtPleasant	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 903-572-3420 183 3
Tulsa	PHONE SERVICES	AT&T	P.O. BOX 5001		CAROL STREAM	IL	60197-5001 877-438-0041			302-655-5049 903-572-3649 413
GREELEY	PHONE SERVICES	AT&T	P.O. BOX 105068		Atlanta	GA	30348-5068			302-655-5049 918-446-2300-925-5
COMPANY WIDE	PHONE SERVICES	AT&T UNIVERSAL BILLER	P.O. BOX 78045		PHOENIX	AZ	85062-8045 800-358-1111			302-655-5049 171-785-3524 107
Dickinson	PHONE SERVICES	Century Link	P.O. Box 29040		Phoenix	AZ	85038-9040			318-388-9562 Acct 701-225-9414 965 DUE 6-28
SHREVEPORT	PHONE SERVICES	CENTURYLINK	P.O. BOX 4300		CAROL STREAM	IL	60197-4300 800-201-4102			318-388-9562 413631622
Omaha	PHONE SERVICES	CENTURYLINK	P.O. BOX 91154		SEATTLE	WA	98111-9254 800-777-9594			318-388-9562 402-345-7051
Salt Lake	PHONE SERVICES	CENTURYLINK	P.O. BOX 29040		PHOENIX	AZ	85038-9040 888-544-4495			318-388-9562 970-353-1760 8798
DES MOINES	PHONE SERVICES	CENTURYLINK	P.O. BOX 20550		ROCHESTER	NY	14602-0550 888-278-8783			318-388-9562
HOUSTON	PHONE SERVICES	FRONTIER	P.O. BOX 20550		ROCHESTER	NY	14602-0550 888-278-8783			203-614-5054
CLARKSBURG	PHONE SERVICES	FRONTIER	P.O. BOX 20550		ROCHESTER	NY	14602-0550 888-278-8783			203-614-5054
OSKALOOSA	PHONE SERVICES	MAHASKA COMMUNICATION	210 S D St		OSKALOOSA	IA	52577			641-676-1099
Guyton	PHONE SERVICES	PTCI	P.O. Box 1188		Guyton	OK	73942 800-562-2556			152529
Billings	PHONE SERVICES	Verizon Wireless	P.O. Box 660108		Dallas	TX	75266-0108			212-571-1897 570875860-00001 / INV
GREELEY	PHONE SERVICES	Verizon Wireless (Es)	P.O. BOX 660108		Dallas	TX	75266-0108			1397895322 due 6-18
GREELEY	PHONE SERVICES	Verizon Wireless (GR)	P.O. Box 660108		Dallas	TX	75266-0108			Acct 372768242-00001 INV
Wichita	PHONE SERVICES	Windstream	P.O. Box 9001950		Louisville	KY	40290 800-600-5050			1398592737 due 6-21
Eldorado	PHONE SERVICES	Windstream	P.O. Box 9001950		Louisville	KY	40290 800-600-5050			102421
CLARKSBURG	PHONE SERVICES	WINDSTREAM	P.O. Box 9001950		Louisville	KY	40290 800-600-5050			115426
Kansas City	TELECONFERENCE SERVICES	AT&T TELECONFERENCE SERVICES	P.O. BOX 5002		CAROL STREAM	IL	60197-5002 800-722-3481			21709934
										302-655-5049 97995067-00001

Location	Service Type	Utility Provider Name	Address1	Address2	City	State	Zip	Phone No.	Fax No.	Account No.
Wichita	Trash service	AAA Portable Service LLC	P.O. Box 16973		Wichita	KS	67216	316-522-6442	316-522-5499	MIDSTATES
El Dorado	Trash service	AAA Portable Service LLC	P.O. Box 16973		Wichita	KS	67216	316-522-6442	316-522-5499	MIDSTATES
BILLINGS	Trash service	Mackenzie Disposal, Inc.	P.O. Box 1116		Billings	MT	59103	406-259-7047	Account #194771 due 6-10	
Cheyenne	Trash service	Verizon Wireless	P.O. Box 660108		Dallas	TX	75266	0108	212-571-1897	670931304-00001 / Invoice
GREELEY	Trash service	Waste Management	P.O. Box 78251		Phoenix	AZ	85062	8251	503-331-2272	#1400661699 DUE 6-29
Salt Lake	Trash service	Waste Management	P.O. Box 78251		Phoenix	AZ	85062	8251	503-331-2272	855-0919186-2534-3
GREELEY	Trash service	Waste Management	P.O. Box 78251		Phoenix	AZ	85062	8251	503-331-2272	Acct #585-0039251-0585-4 due 6-1
Tulsa	Trash service	American Waste Control	P.O. Box 21054		Tulsa	OK	74121	918-446-0023	503-331-2272	Acct #855-0919186-2534-3 due 6-1
Shreveport	Trash service	Republic Services	P.O. Box 9001099		Louisville	KY	40290	318-213-6050	635678	
Coffeyville	Trash service	AT&T	P.O. Box 5014		Carroll Stream	IL	60197	5014	3-0975-0007578	
Wynnewood	Trash service	AT&T	P.O. Box 5014		Carroll Stream	IL	60197	5014	128552243	
Artesia	Trash service	City of Artesia	P.O. Box 1310		Artesia	NM	88211	575-748-8288	302-655-5049	137964558
Dickinson	Trash service	City of Dickinson	99 2nd Street East		Dickinson	ND	58601	562-865-6240	701-456-7015	act #1113320.000
Mt Pleasant	Trash service	City of Mount Pleasant	501 N Madison Ave		Mount Pleasant	TX	75455	903-575-4000	903-577-1828	008-0080465-001
Shreveport	Trash service	City Of Shreveport	P.O. Box 30065		Shreveport	LA	71153	318-673-5510	318-673-6004	R21397254
Tulsa	Trash service	City of Tulsa	Utilities of Service		Tulsa	OK	74187	918-596-9511	918-596-7277	106394638
Greeley	Trash service	Deep Rock Water Company	P.O. Box 660579		Dallas	TX	75266	0579	Account 529948511302460 due 6-17	
Cheyenne	Trash service	Deep Rock Water Company (CH)	P.O. Box 660579		Dallas	TX	75266	0579	Account 39964488070513	
DES MOINES	Trash service	DES MOINES WATERWORKS	2201 GEORGE FLAGG PKWY.		DES MOINES	IA	50321	515-283-8727	314-622-4413	
STL	Trash service	GREGORY F.X. DALY, COLLECTOR OF REVENUE	ST. LOUIS CITY HALL	1200 MARKET STREET, ROOM 110	ST LOUIS	MO	63103	63103		
Billings	Trash service	Montana-Dakota Utilities Co.	P.O. Box 5600		Bismarck	ND	58506	5600	act #488 762 1453 6	
OSKALOOSA	Trash service	OSKALOOSA WATER DEPT	1208 S 7TH STREET		OSKALOOSA	IA	52577		641-673-4692	
Salt Lake	Trash service	Public Utilities	P.O. Box 30881		Salt Lake City	UT	84130	0881	Account #W2115280 due 6-21	
Wichita	Trash service	SUN VALLEY PUBLIC SERVICE	P.O. Box 2922		Wichita	KS	67201	316-265-1300	194187-90666	
CLARKSBURG	Trash service	METROPOLITAN UTILITIES DISTRICT	DISTRICT		REYNOLDSVILLE	WV	26422	304-623-9609		
Omaha	Trash service	METROPOLITAN UTILITIES DISTRICT	P.O. Box 3600		OMAHA	NE	68103	0600		
Guyton	Water and gas	The City of Guyton	219 NW 4th St		Guyton	OK	73942	580-338-3396	580-338-6889	611-0109-00
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000080650 00858461	
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000080650 00858461	
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000080651 00858474	
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000081801 00870383	
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000178080 00858432	
Kansas City	Water and gas	KCMO WATER SERVICES	P.O. Box 807045		KANSAS CITY	MO	64180	7045	000592345 00858427	
GLENCOE	Water and gas	THE UTILITIES BOARD OF THE CITY OF RAINBOW	3700 RAINBOW DRIVE		RAINBOW CITY	AL	35906	256-442-2553	256-442-8384	102832